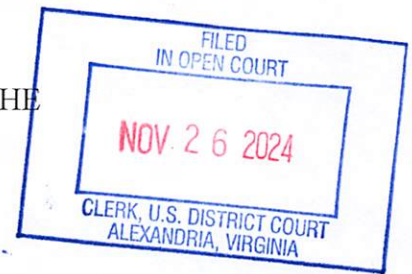


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

DASSE MADOU,

Defendant.

Case No. 1:24-CR-253

Count 1: 18 U.S.C. § 113(a)(6)
(Assault Resulting in Serious Bodily Injury)

Count 2: 36 C.F.R. § 4.2, adopting
Virginia Code Section 46.2-862 (Reckless Driving)

Count 3: 36 C.F.R. § 4.21(c) (Speeding)

INDICTMENT

November 2024 Term – at Alexandria, Virginia

THE GRAND JURY CHARGES THAT:

Count One

(Assault Resulting in Serious Bodily Injury)

On or about May 1, 2024, on the George Washington Memorial Parkway, within the special maritime and territorial jurisdiction of the United States, within the Eastern District of Virginia, the defendant, DASSE MADOU, did assault another person with a vehicle, to wit: Victim-1, and that assault resulted in serious bodily injury.

(In violation of Title 18, United States Code, Section 113(a)(6).)

Count Two

(Reckless Driving)

On or about May 1, 2024, on the George Washington Memorial Parkway, within the special maritime and territorial jurisdiction of the United States, within the Eastern District of Virginia, the defendant, DASSE MADOU, did unlawfully operate a motor vehicle on a highway at a speed

of 20 miles per hour or more in excess of the applicable maximum speed limit and in excess of 85 miles per hour.

(In violation of Title 36, Code of Federal Regulations, Section 4.2, adopting Virginia State Code Section 46.2-862.)

Count Three
(Speeding)

On or about May 1, 2024, on the George Washington Memorial Parkway, within the special maritime and territorial jurisdiction of the United States, within the Eastern District of Virginia, the defendant, DASSE MADOU, did unlawfully operate a motor vehicle at a speed in excess of the posted speed limit.

(In violation of Title 36, Code of Federal Regulations, Sections 4.21(c).)

A TRUE BILL

Pursuant to the E-Government Act,
The original of this page has been filed
under seal in the Clerk's Office

FOREPERSON

Jessica D. Aber
United States Attorney

By: Katherine Legel-Kasper
Katherine Legel-Kasper
Special Assistant United States Attorney
April Russo
Assistant United States Attorney